

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Vs.

Criminal no. 98-273-04 (JPG)

JORGE LUGO PAGAN  
Defendant

**MOTION PRO-SE SEEKING A CONSIDERATION FROM THIS HONORABLE COURT TO ALLOW  
THE FEDERAL SENTENCE OF THE ABOVE DEFENDANT, CONCURRENT WITH THE STATE SENTENCE  
OF THE DEFENDANT.**

**TO THE HONORABLE JUAN PEREZ GIMENEZ UNITED STATES DISTRICT FOR PUERTO RICO**

**COMES NOW**, The above captioned defendant pro-se and moves this  
Honorable court as follows:

1) The captioned defendant in this case was sentence to 60 months  
of imprisonment pursuant to a motion under section 5.k.1.1 of the u.s.  
sentencing commissioned guidelines manual. This sentence was issued on  
March 8, 2002.

2) The defendant was sentence to to served 264 months of imprisonment,  
at the STATE level on February 29, 2000.

3) On the day of the sentencing hearing, the counsel for the defendant  
(Mariangela Tirado Vales, Esq.) made a request, to the Honorable Judge Juan  
Perez Gimenez to have the defendant's federal sentence concurrent with  
defendant's sentence at the state level.

4) The defendant received a copy of the judgement on this criminal case  
and that request does not appear on the document. The counselor for the  
defendant, advised him that the Honorable Judge had denied the request and  
that's why the defendant is respectfully requesting that this Honorable court  
**re-consider** it's prior decision and grant defendant's petition to have both  
Federal and State sentence concurrent.

*Exhibit 1*

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JORGE LUGO PAGAN  
CRIMINAL NO. 98-273-04 (JPG)

Wherefore, the defendant respectfully request from this Honorable Court to give a re-consideration to defendant's petition, of having his Federal sentence concurrent with his sentence at the State level and that the Honorable Court order that,

A) a copy of Judgement be served to the Bureau of Prisons Administration,

B) and to send a copy to the defendant and the U.S. Marshalls.

Respectfully,

A handwritten signature in cursive script, reading "Jorge I. Lugo Pagan", written over a horizontal line.

JORGE LUGO PAGAN  
REG. NUM. 17843-069  
FEDERAL CORRECTIONAL  
INSTITUTION MIAMI  
P.O. BOX 779800  
MIAMI, FLORIDA 33177